

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:15CV1046
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
)	
v.)	
)	
CITY OF CLEVELAND,)	<u>RESPONSE TO CITY OF CLEVELAND'S</u>
)	<u>MOTION REGARDING CHARTER</u>
Defendant.)	<u>AMENDMENTS</u>
)	

The City of Cleveland has filed a motion (Dkt. # 389) to modify the Settlement Agreement (“Agreement”) in this matter (Dkt. # 7-1) to incorporate newly adopted and amended provisions of its Charter. As the City notes (Dkt. # 389 at p. 3), the Agreement provides at paragraph 398 that “the City and DOJ may *jointly agree* to make changes, modifications, and amendments to this Agreement, which will be effective if approved by the Court.” (Dkt. #7-1, p. 96, emphasis added). Thus, the Agreement contemplates a process in which the City and the Department will jointly consider any proposed changes.

The United States therefore requests that the Court grant the parties until February 18, 2022 to engage in the process for modification outlined in Settlement Agreement. The United States will work diligently to complete these discussions and address the Charter amendments’ impact on the Agreement expeditiously, but we recognize that the City will be in transition to the administration of Mayor-elect Justin Bibb. We will keep the Court and the Monitor informed regarding the parties’ progress in determining whether any modifications to the Agreement are warranted.

CONCLUSION

The United States respectfully requests that the Court grant the parties until February 18, 2022 to consider any proposed changes to the Agreement in accordance with the modification process set forth in the Agreement.

Respectfully submitted,

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